

SEP 28 1984

STANLEY G. FLAGG & CO., INC.

A subsidiary of Amcast Industrial Corporation

QUALITY PRODUCTS SINCE 1854

September 26, 1984

**RECEIVED
STATE PROGRAMS SECTION**

OCT 12 1984

U.S. EPA, REGION III

Mr. Jim Dolan
Solid Waste Coordinator
Bureau of Solid Waste
Department of Environmental Resources
1875 New Hope Street
Norristown, PA 19401

Dear Mr. Dolan:

This letter will serve as an addendum to our Lagoon Closure Plan originally submitted to Mr. Bruce Beitler on December 13, 1983. The Addendum is required due to planning changes proposed by Flagg since the original plan was submitted. This information will also include the items discussed during your inspection visit of August 28, 1984. That inspection was summarized earlier in a letter to you dated August 30, 1984.

I will deal with the North Lagoon and Galvanizing Lagoons separately since different methods of closure will apply to each.

I. North Lagoon

Previous correspondence submitted to DER shows the results of three (3) separate tests for EP Toxicity on the North Lagoon sludge are all negative, or not toxic. In addition results of testing using the ASTM-A test method have also been conducted on this material. This information has also been submitted to DER. It is now anticipated that this lagoon will be used on an emergency impoundment for our wastewater treatment plant. We have already had preliminary discussions with the Bureau of Water Quality in this regard. Closure of this lagoon is planned as follows.

A. Testing

As discussed during your inspection visit of August 28, Flagg will conduct a liner compatibility test utilizing Test Method 9090. A copy of this test method was supplied by Mr. Dinesh Radjkotia, of your department. This test is required due to elevated levels of Chemical Oxygen Demand (COD) appearing in the analytical data. Purpose of this test will be to determine whether the material can be codisposed in our proposed on-site landfill.

B. Excavation

As discussed in A above the liner compatibility test will be the determining factor on where the ultimate disposal of this material takes place. Upon that determination the material will be excavated using a front end loader and dump truck. Material will be excavated to a depth of approximately 13-15 feet, or where a distinct break is evident between the fill material and the natural ground surface.

C. Preparation of Subgrade

The entire subgrade shall be free of abrupt breaks, rock, boulders or other types of debris. A four (4) inch layer of sand will be placed and leveled, as a subbase prior to installation of a membrane liner.

D. Liner

A membrane liner of acceptable thickness and meeting required specifications will be installed. The liner will have two (2) holes to provide inlet and outlet ports. In addition the liner will be anchored properly all the way around the lagoon. A more detailed proposal will be submitted to you as it is put together and concurrent with our submittal to the Bureau of Water Quality.

II. Galvanizing Lagoons

As indicated in our original closure plan all free standing water in both lagoons has been pumped to our wastewater treatment facility and discharged. The galvanizing waste stream itself has also been diverted to our wastewater treatment plant. Some excavation of materials, from both lagoons, has already taken place. A Module 1 was prepared on this material and submitted to DER (Larry Lusk) on March 28, 1984. By a telephone call on May 31, 1984 to Mr. Peter Aldred, of my staff, Dinesh Radjkotia, of your office confirmed that all sludges (wastewater treatment plant and galvanizing lagoon) would be allowed to be codisposed in our on-site landfill with the possible exception of the North Lagoon sludge.

Further closure of these lagoons is now planned as follows:

A. Testing

Per your inspection visit of August 28, 1984, individual composite samples will be collected of the bottom materials from both lagoons. Prior testing has indicated the material to be non-hazardous. These samples will be analyzed for the following constituents:

1. EP Toxicity
2. Total Zinc
3. Chemical Oxygen Demand
4. Total Organic Carbon

A sketch showing the sample collection points will also be provided. In addition, a further sample will be collected from the cut area between the lagoons. The cut area to be sampled will be the area below the five (5) foot level, measuring from the surface. This composite sample will be analyzed for the same constituents listed above. Mr. Doug Mason, of your office, will be notified prior to the collection of any samples.

B. Excavation

Additional excavation will take place of all dark appearing material. Enough material will be excavated to show clay like surfaces on sides and bottoms of both lagoons.

C. Erosion Control

Seeding of the banks of the galvanizing lagoons will be carried out utilizing the same seeding program as specified in the Consent Order for an area of our existing landfill, (Item #20).

There are no current plans to fill these lagoons but rather leave them empty to see how they may fit into future company planning. This concept was first brought up in a meeting held with Larry Lunsik and Dinesh Radjkotia on February 16, 1984 at the Norristown office. No objections were raised by either individual at the time. I also understand that there are no formal regulations in place for the closure of non-hazardous waste lagoons.

At such time as the above program has been completed, with regard to the galvanizing lagoons we will invite you back for a further inspection. With your concurrence we will then provide the two (2) required Certificates of Closure.

Should you require additional information please contact Mr. Peter Aldred, of my staff, at the letterhead address or by telephone at (215) 326-9000, Ext. 332.

Very truly yours,

STANLEY G FLAGG & CO., INC.


Kenneth R. Shaner
Vice President - Operations

KRS/JPA/mas

Attachment

cc: Consent Order File

AUG 31 1984

STANLEY G. FLAGG & CO., INC.

A subsidiary of Amcast Industrial Corporation

QUALITY PRODUCTS SINCE 1854

August 30, 1984

Mr. Jim Dolan
Hazardous Waste Coordinator
Bureau of Solid Waste
Department of Environmental Resources
1875 New Hope Street
Norristown, PA 19401

Dear Mr. Dolan,

This letter will summarize the points agreed upon during a visit to the Flagg facility on August 28, 1984 by yourself, Dinesh Radjkotia, and Doug Mason.

1. Galvanizing Lagoons

- A. An individual composite sample will be collected from the bottoms of the West & East Lagoons. This sample will be analyzed for the following parameters:

1. EP Toxicity
2. Zinc
3. Chemical Oxygen Demand
4. Total Organic Carbon

A sketch will be provided showing the points from which the samples were composited.

- B. A composite sample will be made from the cut area between the lagoons from an area approximately five (5) feet down to the bottom, and on both sides. This sample will be analyzed for the same parameters as A.
- C. Doug Mason, Soil Scientist will be notified prior to the above samples being collected.
- D. The dark stained material will be excavated from both lagoons.
- E. Erosion control will be provided for all banks.
- F. An addendum to the closure plan will be submitted.

2. North Lagoon

- A. An addendum to the closure plan will be submitted.
- B. Erosion control will be provided for the banks.

C.. Disposition of any material removed from this area will be dependent on determining liner compatibility.

Unless I hear to the contrary by September 20, 1984 I will assume that you concur with my review of these matters.

Very truly yours,

STANLEY G FLAGG & CO., INC.

J. Peter Aldred

J. Peter Aldred
Environmental Engineer

JPA/mas

cc: Solid Waste File
Dinesh Radjkotia/DER Norristown
Doug Mason/DER Norristown